

Commissioner for Patents
Page 11

Serial No.: 09/739,902

REMARKS/ARGUMENTS

Claims 1, 3 and 8 have been amended to correct typographical errors: The three instances of "IP" in each of claims 1, 3 and 8 have been replaced by the correct abbreviation for interior router, which is "IR".

Drawings

The Office Action has requested that new drawings be provided in which devices are labelled with words. It is respectfully submitted that this requirement is unwarranted, given the clarity of the drawings currently on file. With respect to Fig. 1, all of the components are not only numbered but labeled with abbreviations, such as ABR and IR, and the user machines (12) are shown graphically with a computer icon. With respect to Fig. 2, again, it is not apparent to Applicant how the addition of words labelling various components would enhance the intelligibility or clarity of these drawings. A person of ordinary skill in the art would readily appreciate that the components are drawn, not merely in block format, but in shapes that are representative of each of the devices. For example, the links (14), database (32), switch fabric (28) are all illustrated using shapes and symbols that are readily recognizable by those of skill in the art. Furthermore, the control unit (30) is labelled as such, and the only remaining components are the ingress and egress interfaces (22, 24) and their respective ports (22, 26). Therefore, it is respectfully submitted that the drawings, as they currently stand, are clear, unambiguous and fully in compliance with the applicable statutory provisions and regulations.

Specification

The Office Action has objected to the title of the invention as being insufficiently descriptive of the invention as claimed by Applicant. In response thereto, Applicant has amended the title of the invention to read "DORMANT BACKUP LINK FOR OSPF NETWORK PROTECTION". It is respectfully submitted that this new title is now descriptive of the invention to which the claims are directed.

Commissioner for Patents
Page 12

Serial No.: 09/739,902

Claim Rejections - 35 USC § 102

The Office Action has rejected claims 1-33 under 35 U.S.C. 102(b) as being anticipated by United States Patent No. 5,959,972 (Hamami et al.). Specifically, the Office Action has identified column 4, lines 38-50 of this reference as being the source of this anticipation rejection.

With respect, Applicant strongly disagrees that Hamami anticipates claims 1-33 of the present application. First of all, the claims of the present application are directed to a method, a router and a software program, which protect an Open Shortest Path First (OSPF) network against network failures affecting traffic flow between an interior router (IR) and a predetermined primary area border router (ABR) using a back-up link between the IR and a predetermined alternate ABR. The OSPF network is a connectionless-type network in which packetized data is forwarded according to continually updated forwarding tables. In contrast, Hamami teaches a method of ports/link redundancy in an ATM switched network. Therefore, whereas the present application teaches the use of a dormant back-up link between the interior router (IR) and the alternate area border router (ABR), the prior art merely teaches the use of a back-up link between two ATM switches. Therefore, it is respectfully submitted that since Hamami et al. do not teach a back-up link between an interior router (IR) and a predetermined area border router (ABR), the rejection of claims 1-33 as being anticipated by this prior art reference is therefore improper and should be withdrawn.

Furthermore, it is respectfully submitted that a person of ordinary skill in the art would not look to this prior art reference in order to arrive at the solution taught by the present application. In other words, analogies between ATM and OSPF networks are of limited value because the former are connection-oriented, whereas the latter are connectionless. Yet a further distinction is to be found in the limitation that "no traffic is forwarded to the back-up link during normal operations of the network. In Hamami, it is expressly stated that "all traffic directed to the main link port is duplicated to the backup link port ... using the multicast capability of the switch." (column 6, lines 1-5). Moreover, Hamami states that "once the virtual circuits have been established, all ingress traffic at the

Commissioner for Patents
Page 13

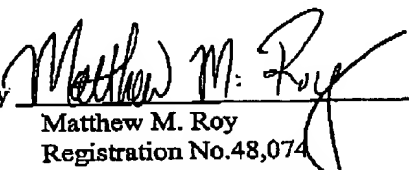
Serial No.: 09/739,902

backup link port is blocked until a main link failure event occurs". This clearly teaches away from the limitation that no traffic is forwarded to the back-up link during normal operations of the network.

Therefore, for the reasons noted above, it is respectfully submitted that claims 1-33 are neither taught nor suggested by the Hamami reference. It is therefore respectfully submitted that the claims, as they currently stand, are in a condition for immediate allowance. Applicant therefore respectfully requests the prompt issuance of a Notice of Allowance.

Respectfully submitted,

NORTEL NETWORKS LIMITED

By 
Matthew M. Roy
Registration No. 48,074
Attorney for Applicant

MMR/sw

Address:
1981 McGill College Avenue, Suite 1600
Montreal, Quebec, Canada H3A 2Y3